

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

FRANK PRUCHNIK, Plaintiff, v. ROBERT BUERKLE GmbH & CO. Defendant.)))))))	CIVIL ACTION NO. 04-10868 NMG
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JOINT MOTION TO AMEND SCHEDULING ORDER

The parties jointly move to amend the scheduling order to allow for additional time to complete fact and expert discovery in this case. As grounds for the request the parties state that fact discovery has taken longer than expected in part due to the fact that it took longer than anticipated for the defendant, located in Europe, to respond to the plaintiff's interrogatories and document requests. The defendant anticipates serving its responses shortly which will enable the parties to finish the remaining fact depositions, identify experts and otherwise prepare the case for trial. The parties therefore request that the Court allow their joint request to amend the original scheduling order deadlines by sixty (60) days. The parties' proposed amended schedule is as follows:

April 27, 2007	Completion of all discovery, other than requests for expert disclosures.
May 15, 2007	Plaintiff's service of all expert disclosures, if any, pursuant to Fed. R. Civ. P. 26(a)(2).
June 30, 2007	Defendant's service of all expert disclosures, if any, pursuant to Fed. R. Civ. P. 26(a)(2).
August 15, 2007	Deadline to complete expert depositions.
August 15, 2007	File any dispositive motions under Fed. R. Civ. P. 56, with all supporting documents.

The parties respectfully request that the Court allow their motion to amend the schedule as outlined.

Respectfully submitted,

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By his attorneys,

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